UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

SUSAN FRANCIS,) Civil Action No. 1:21-CV-00669
Plaintiff,) Judge Pamela A. Barker
V.)
NORTHEAST OHIO NEIGHBORHOOD HEALTH SERVICES, INC., et al.,))
Defendants.))
)

JOINT MOTION FOR THIS COURT TO DISMISS THE LAWSUIT WITH PREJUDICE AND RETAIN JURISDICTION TO ENFORCE THE SETTLEMENT

Plaintiff Susan Francis and Defendants Northeast Ohio Neighborhood Health Services, Inc., Perry Murdock, and Dr. Erika Staneff, by and through their respective undersigned counsel, respectfully move this Court for an order dismissing Plaintiff's lawsuit with prejudice, each party to bear its own costs, and for this Court to retain jurisdiction to enforce the terms of the parties' settlement agreement. A proposed order is attached.

Respectfully submitted,

/s/ Jazmine Greer
Jazmine Greer (0083706)
1468 E. 55th Street
Cleveland, OH 44103
j.greer@greerlawfirmohio.com
216-218-0112
216-916-1086 (fax)
Counsel for Defendants

/s/ Brad Levine
Stephan I. Voudris (0055795)
Brad Levine (0090286)
Voudris Law LLC
8401 Chagrin Road, Suite 8
Chagrin Falls, OH 44023
svoudris@voudrislaw.com
blevine@voudrislaw.com
440-543-0670
440-543-0721 (fax)
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February 2022, the foregoing was served via operation of this Court's Electronic Filing System.

/s/ Brad Levine